

### **Remarks**

In response to the Office Action mailed December 8, 2004, Applicants sincerely request reconsideration in view of the above claim amendments and the following remarks. The claims as presented are believed to be in allowable condition.

In the above-referenced claim amendments, claims 1, 2, 3, 6, 7, 10, 14, 16, 19, 21, 24, 26, and 27 have been amended. Independent claims 1, 10, 19, and 27 have been amended to clarify that the string of text is automatically received as the string is being entered into an electronic document and that labels are associated with the string of text. Dependent claims 2-3, 6-7, 14, 21, 24, and 26 have been amended to conform with language in these claims with the corresponding independent claims. Claims 21 and 26 have also been amended to correct typographical errors regarding dependencies to independent claims which were noted in the present Office Action. Support for these amendments may be found on page 12, line 14 through page 14, lines 1-24 in the Specification. No new matter has been added.

Claims 1-3, 5-8, 10-19, 21, and 24-28 are currently pending in the application. Claims 1-3, 5-19, 21, and 23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Beauregard et al. (U.S. Patent 5,974,413, hereinafter "Beauregard") in view of Church et al. (U.S. Patent 5,541,836, hereinafter "Church").

### **Claim Objections**

Claims 21 and 26 are objected to because of various informalities noted in the Office Action. These claims have been amended to correct the noted informalities. Therefore, it is respectfully requested that the objections to these claims be withdrawn.

### **Claim Rejections—35 U.S.C. § 103**

Claims 1-3, 5-8, 10-19, 21, and 24-28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Beauregard in view of Church. The rejection of these claims is respectfully

traversed. Beauregard discloses a semantic user interface (SUI) from which a user is enabled to enter "action words" to control the operations of a computer. An action word may be either a single word or a phrase that includes two or more words. In the SUI, each action word is compared against the contents of a wordbase. The wordbase includes a plurality of item records. Each item record includes an action word and an associated service script for performing various actions such as issuing a command to launch an application. If the action word is located in the wordbase, the service script associated with the action word is executed. See Col. 5, lines 12-52. The SUI of Beauregard detects the keystrokes, which may make up action words, as they are being entered. If the keystrokes correspond to an action word, the service script associated with the action word is retrieved. The system then erases the action word from the user's input text before executing the related service script. See Fig. 7 and Col. 36, lines 2-25.

Amended independent claim 1 specifies a method for semantically labeling a string of text in the electronic document created in an application program module. The method includes automatically receiving the string of text in a recognizer dynamic-link library after the entire string of text has been entered in the electronic document, transmitting the string of text to a plurality of recognizer plug-ins, in each of the plurality of recognizer plug-ins, annotating the string of text to determine a label, transmitting the labels from the recognizer plug-ins to the recognizer dynamic-link library, transmitting the labels to the application program module, and associating each label with the string of text.

Beauregard fails to disclose a method which teaches, discloses, or suggests automatically receiving a string of text in a recognizer dynamic-link library after the string of text has been entered in an electronic document. As noted above, Beauregard is specifically limited to recognizing action words as they are being entered into an application program. In the Office Action, it is alleged that Beauregard also teaches receiving a string of text in a recognizer after

the entire string of text has been entered into an electronic document library (Fig. 7, col. 5, lines 12-56, and col. 36, line 63-col. 37, line 7). However, the aforementioned figure and sections of Beauregard only disclose the recognition of action words "on the fly" (see col. 5, lines 17-40 and lines 59-62) or, alternatively after a user manually selects or "highlights" a given word from a previously created input source document and then clicks an icon on a monitoring bar (see Fig. 3 and col. 36, line 63-col. 37, line 7). Thus, Beauregard fails to teach automatically receiving a string of text.

Beauregard further fails to teach associating labels with recognized strings of text. In the Office Action, it is alleged with respect to pending claim 24, that Beauregard teaches labeling strings of text (i.e., "labeling the string of text with an associated stored label of a matched stored string") at Fig. 7, col. 5, lines 12-56, and col. 36, line 63 - col. 37, line 7. However, none of the aforementioned sections teaches associating labels with recognized strings of text. For example, Col. 36, line 63 - col. 37, line 7 discloses that a user may select text in a document and then click on an icon on a monitoring bar to initiate searching a wordbase in order to determine whether the selected text is an action word. Thus, there is no teaching or suggestion in Beauregard for appending a label to recognized strings of text. Moreover, it is respectfully submitted that such a feature would be inapposite to Beauregard's intended function. As discussed above, Beauregard is directed to automatically providing or pushing actions to a user when a word is recognized as an action word. As embodied in independent claim 1 and its subsequent dependent claims, strings of text in a document are recognized by a recognizer dynamic link library and labeled (e.g., as a stock symbol, geographic location, etc.). Then actions are determined for the recognized text based on the labels and displayed to a user, thus allowing the user to select one or more of the displayed actions or even to ignore the displayed actions generated with respect to labeled strings of text.

Church, relied upon to cure the deficiencies of Beauregard, discloses a method of automatically determining that a word/sense pair has a sense which suits a given position in text. The method includes determining the sense of a given occurrence of a word by comparing a first determination with a determination of the sense of a neighboring occurrence of the word (col. 3, lines 45 through col. 4, lines 1-6). Church, however, fails to teach, disclose, or suggest each of the features of amended independent claim 1, recited above.

Since neither Beauregard nor Church teaches, discloses, or suggests each of the features specified in amended independent claim 1, this claim is allowable and the rejection of this claim should be withdrawn. Dependent claims 2-3, 5-8, and 24-26 each depend from amended independent claim 1 and thus specify at least the same features as amended independent claim 1. Therefore, dependent claims 2-3, 5-8, and 24-26 are also allowable for at least the reasons given above and the rejections of these claims should also be withdrawn. Independent claims 10, 19, and 27 specify similar features as amended independent claim 1 and thus are allowable for at least the same reasons. Therefore, the rejections of claims 10, 19, and 27 should also be withdrawn. Dependent claims 11-18 depend from independent claim 10 and thus specify at least the same features. Similarly, dependent claim 21 depends from independent claim 19 and thus specifies at least the same features. Similarly, dependent claim 28 depends from independent claim 27 and thus specifies at least the same features. Therefore, dependent claims 11-18, 21, and 28 are also allowable for the reasons given above and the rejections of these claims should also be withdrawn.

#### **Conclusion**

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after

this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

Respectfully submitted,

MERCHANT & GOULD



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